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PACIFIC  **TELESIS**
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy
Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554


Dear Ms Searcy:

Re: *CC Docket No. 93-55 - Amendment to Part 61 of the Commission's Rules Requiring
Metric Conversion of Tariff Publications and Supporting Information*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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CC Docket. No. 93-55

The Commission proposes three options. Option one would require a carrier to provide in the general rules section of a tariff publication, a table for converting non-metric units and corresponding rates to metric units. This option does not require that a metric unit or corresponding rate appear in the tariff or supporting information. Option two would allow a carrier to state in the applicable rate section of the tariff publication and in supporting information, the metric unit and corresponding rate in parenthesis beside the non-metric unit and rate. Option three would require a carrier to provide in its

tariff, a conversion table for converting non-metric units and corresponding rates into metric units and rates. Only the resulting metric unit and rate would be clearly shown in the tariff publication and in all supporting information filed with the Commission.¹

The Pacific Companies support the use of option one. It is the least burdensome option. It would not require any changes in technical publications referenced in the tariffs nor would it require any billing changes. Changes in the billing system and/or technical publications would be very time-consuming and costly. In addition, option one will allow for parity with state tariffs which is a benefit to customers. Otherwise, with option three, for example, customers would be looking at rates based on the metric systems in the federal tariff and non-metric rates in the state tariffs.

Finally, option one would not require the reformatting and resubmission of a majority of the tariff pages. Options two and three would require reformatting and resubmission. For example, placing the metric rate in a parenthetical as required by option two may be difficult to accommodate on an already crowded tariff page. Consequently, the layout of that page may need to be redesigned to accommodate the change.

¹ In the Matter of Amendment of Part 61 of the Commission's Rules Requiring Metric Conversion of Tariff Publications and Supporting Information, CC Docket No. 93-55, Notice of Proposed Rulemaking, released April 8, 1993, para. 7.

The Pacific Companies urge the Commission to require all carriers to use option one. Use of different options by different carriers would be confusing to customers.

The Commission notes in its Notice of Proposed Rulemaking that Tier 1 Carriers already compete in international markets which use the metric system. Consequently, it implies that use of the more burdensome options should be advantageous to them. The Commission overlooks the fact that some Tier I carriers are local exchange carriers, such as the Pacific Companies, that file only domestic tariffs. For us there is no inherent advantage in adopting the more burdensome options. Moreover, as noted above, the more burdensome options would be costly and time-consuming to implement because of the need for changes in the billing system, changes in technical publications, and the reformatting of tariff pages, and would result in customer confusion.

For the foregoing reason, the Pacific Companies respectfully request the Commission to adopt the use of option one for all carriers.

Respectfully submitted,

PACIFIC BELL
NEVADA BELL



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